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Attorney for Defendant  
JOSE CURIEL

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	Case No. 2:22-cr-00151-WBS-1
	)	
Plaintiff,	)	STIPULATION FOR MODIFICATION OF
	)	CONDITIONS OF PRETRIAL RELEASE;
vs.	)	<del>PROPOSED</del> ORDER
	)	
JOSE CURIEL,	)	Hon. Jeremy D. Peterson
	)	
Defendant.	)	
	)	
	)	

The defendant, JOSE CURIEL, by and through his attorney of record, Assistant Federal Defender Megan T. Hopkins, and the UNITED STATES, by and through its attorney of record, Justin Lee, hereby stipulate to and request an order from this Court modifying the conditions of Mr. Curiel's pretrial release to modify Special Condition 13, setting forth the times for the previously-imposed location monitoring: curfew condition, as follows:

"13. CURFEW: You must remain inside your residence every day from 9:00 pm to 6:00 am, or as adjusted by the pretrial services officer for medical, religious services, employment, or court-ordered obligations."

Mr. Curiel has been on pretrial release in this district since July 2022, on a \$4,000 unsecured appearance bond. *See* Dkt. 18. Mr. Curiel is in compliance with all of his conditions of release. One of those conditions of release is location monitoring. Mr. Curiel is currently subject to home detention: curfew and must remain inside his residence between the hours of 6:00 p.m. and 6:00 a.m., except for pre-approved employment; education; religious services; medical, substance abuse, or mental health treatment; attorney visits; court appearances; court

1 ordered obligations; or other activities authorized by the pretrial services officer. Mr. Curiel has  
2 daughters from a previous relationship whose mother and primary custodial parent has indicated  
3 would be willing to facilitate more frequent and longer visits between Mr. Curiel and his  
4 children, if he were able to pick them up and bring them home in the evening. An extension of  
5 Mr. Curiel's curfew hours would permit him the additional time needed to increase his visits  
6 with his daughters. Accordingly, in light of Mr. Curiel's history of compliance with all of his  
7 conditions and the reduced assessment of flight risk and/or danger in this case, the parties request  
8 that **Special Condition 13 be modified to a curfew from 9:00 p.m. to 6:00 a.m., daily.**

9  
10  
11 DATED: August 4, 2023

Respectfully submitted,  
HEATHER E. WILLIAMS  
Federal Defender

12  
13 /s/ Megan T. Hopkins  
MEGAN T. HOPKINS  
Assistant Federal Defender  
Attorney for JOSE CURIEL

14  
15  
16 DATED: August 4, 2023


PHILLIP A. TALBERT  
United States Attorney

17  
18 /s/ Justin Lee  
JUSTIN LEE  
Assistant United States Attorney  
Attorney for the United States

**~~PROPOSED~~ ORDER**

GOOD CAUSE HAVING BEEN SHOWN, IT IS HEREBY ORDERED THAT Special Condition 13 shall be modified to reflect that Mr. Curiel shall be subject to a curfew from 9:00 p.m. to 6:00 a.m., daily. All other conditions of pretrial release shall remain in force.

DATED: August 4, 2023

  
HON. JEREMY D. PETERSON  
United States Magistrate Judge